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Madison, WI 53703**Received****NOV 16 1999****DSC-RP**

November 8, 1999

Clifford Hawkes, 12795 West Alameda Parkway, Lakewood, CO 80228

Dear Mr. Hawkes:

Following are my comments regarding the Winter Use Plan EIS for Yellowstone and Grand Teton National Parks and John D. Rockefeller Memorial Parkway.

In large part my comments reiterate the suggestions I gave to the National Park Service as part of my master's thesis, *The Development of Snowmobile Policy in Yellowstone National Park* (University of Montana, 1998). I have published two articles summarizing my work: "Snowplanes, Snowcoaches and Snowmobiles: The Decision to Allow Snowmobiles into Yellowstone National Park," *Annals of Wyoming* 70(3): 6-23, Summer 1998; and "The Development of Snowmobile Policy in Yellowstone National Park," *Yellowstone Science* 7(2): 2-10, Spring, 1999. I suggest you add these references to your bibliography, as they have important background information and perspective on the topic of Yellowstone's winter use.

In general, I support the preferred alternative/Alternative B, but with several major changes, as follows.

- 1) The NPS should not only plow the road from West Yellowstone to Old Faithful, but should also plow the road from Madison to Mammoth. There are several reasons for this:
 - a) Plowing is less expensive than grooming oversnow roads, so this would save the federal government a significant amount of federal funds;
 - b) Plowing all of the roads from Mammoth to Old Faithful would facilitate winter touring into the park from Mammoth Hot Springs. The preferred alternative as it stands would have visitors (and park employees) from Mammoth taking oversnow vehicles as far as Madison, thereupon transferring onto buses. This presents an awkward touring/travel situation.
 - c) Plowing all the west-side roads would take the pressure off the space-limited Madison area to serve as a staging area. The Norris area would then be the logical staging area for oversnow travel to the Canyon/Lake/West Thumb area. Norris, with its large parking lot, would be a much better staging area than Madison.

d) Plowing all the west-side roads as indicated would be more consistent. If it is possible to plow to Old Faithful, which receives the heaviest snowfall on these west-side roads, then it should also be possible to plow from Madison to Mammoth, a stretch of road that receives generally less snow than Old Faithful. Blowing and drifting snow on Swan Lake Flats is not that much worse than it is on Fountain Flats, which the plan proposes to plow. Hence, conditions on the other west-side roads should permit effective plowing from Mammoth to Madison as well as West to Old Faithful.

- 2) The National Park Service should restrict travel on all newly-plowed roads (West Yellowstone to Old Faithful and Madison to Mammoth) to publicly-operated vehicles such as buses and vans. There are many, many reasons to keep these roads closed to private vehicles:

- a) Once a door is opened to the public, it is very difficult to close—much more difficult than it was to open that door in the first place. Denali National Park administrators understood this concept when they decided to keep the main park there closed to private automobiles upon the completion of the state highway that now passes the entrance of the park. They made the decision to restrict summer traffic to buses, and have established a tradition of environmentally-preferable mass-transit travel. Yellowstone administrators are faced with a similar opportunity at this point: providing for winter visitation while keeping the door to private automobiles closed. Let's use the vision that Denali administrators used as we go about making these upcoming major decisions in Yellowstone—allow continued visitation without the automobile. In so doing, we'll set the same good example that Denali administrators have.
- b) By restricting travel on these roads to public vehicles, the NPS can very easily institute carrying-capacity limits to the numbers of visitors (or vehicles) allowed in. All such touring vehicles would either be owned by the park concessionaire (AmFac Parks & Resorts) or by commercial-use-license operators. Hence, with government control over all vehicles used in the park in the winter, the NPS could keep effective control of their numbers. Such a system would more easily facilitate adaptive management changes as well.
- c) Tours on such public vehicles would be much more affordable to the general public than tours on either snowcoaches or snowmobiles are today. Based upon AmFac's pricing structure for winter snowcoach tours and summer bus tours, the bus tours cost only about 1/3 as much as snowcoach tours, and only about 1/5 the cost of a snowmobile rental. Even given potentially higher operating costs in winter, winter bus tours would still likely cost only half the amount of a snowcoach tour or about 25% that of a snowmobile rental. In other words, while the cost to visit Old Faithful would, under this option, be more than driving one's personal vehicle into the park, it would still be significantly less than the current system allows.

- d) Only drivers experienced in winter driving would be driving in the park. Many current winter visitors are from southern, snow-free states, and are inexperienced in winter driving. Allowing them into Yellowstone in their own vehicles promises no end of traffic accidents. A system that uses only public transportation would presumably use drivers who are experienced in winter driving. Such a system, then, will have obvious safety benefits. Additionally, plowed roads are likely to have wildlife on them at times, and probably in somewhat predictable places. It follows that another safety benefit of public transportation's experienced drivers is that they will come to learn where these areas are, and will slow down or exercise caution as necessary.
- e) Forcing all visitors to take public transportation will also effectively force them to be educated about the park (and the benefits of mass transit). Since they would be a captive audience inside the vehicle, the park can use knowledgeable driver-guides to give the visitors an interpretive tour of the park while conducting the visitor to their destination. In this manner, the park can cast its preservation message to a wider audience.
- f) By forcing all visitors to take public transit, the NPS would open a new economic door for gateway communities that would compensate (at least in part) for the closure of the other (reduction in snowmobile rentals). In this way, the NPS could ease the economic transition to an economy less dependent on the rental of snowmobiles.
- g) Public vehicles would create much less air and noise pollution than either existing snowmobiles or snowcoaches. Snowmobile air and noise pollution is well-known, and even large buses would greatly reduce both. Additionally, buses and vans would reduce fuel consumption over snowmobiles and snowcoaches. My personal experience as a snowcoach driver and a bus driver in Yellowstone tells me that snowcoaches average only about 2 miles per gallon, while buses average 5-6 miles per gallon and vans even more. Hence, restricting travel to buses and vans would not only realize the greatest reduction in air and noise pollution, but would also accomplish the greatest reduction in fuel consumption.
- h) Buses and vans, by virtue of being taller than most private vehicles, would enable their passengers to sit above the roadside berms of snow created by plowing, and in that way more easily view park scenery than automobile passengers would be able to. The thought that such berms would restrict the visitor's view of the park has been used since the 1960's, and has never been tested. It's a tired argument, and should not be used as a reason against plowing. In fact, countering this argument is the fact that the NPS currently plows U.S. Highway 191, which receives as much snow as the Old Faithful area in the Divide Lake area, yet berms of snow do not obstruct one's view off the roadbed there.

- 3) The National Park Service should close Sylvan Pass in the winter. There are two obvious reasons for this:
 - a) To keep this route open in winter, the NPS must not only groom it regularly but must also staff the East Entrance and discharge potential avalanches at Sylvan Pass. Yet, this is the least-traveled route in the park. The small number of snowmobiles traveling this route in winter just do not justify the great expense to keep it open. The NPS in this manner could save much-needed funds.
 - b) Sylvan Pass is dangerous. Need I say more than to mention the death of Bob Mahn a few years ago?
- 4) Snowfall on the remaining road system (Norris to West Thumb via Lake and South Gate to Old Faithful) is heavy and accumulates to great depths. Hence, plowing these roads is not feasible, and travel on them should remain over-snow. However, the National Park Service should restrict travel on them to snowcoaches, which would eliminate snowmobiles from the park altogether. There are many reasons for this:
 - a) Snowcoaches, like buses, are significantly quieter than snowmobiles are. Eliminating snowmobiles altogether would go a long way toward restoring the park's awesome winter silence. In my five winters in Yellowstone, I skied to many places deep in Yellowstone's backcountry (some of them as far as nine miles from the nearest road), and have *not been able to escape the noise of snowmobiles*. I have personally heard them from Shoshone Geyser Basin, Cowan Meadows, Heart Lake, Mallard Lake, Summit Lake, and Mt. Washburn. Restoring the park's winter quiet is a must, and *cannot* be accomplished without eliminating snowmobiles *entirely*. While it should be possible to design quieter snowmobiles, snowmobile manufacturers have been reluctant to do so, probably because most snowmobile buyers want more powerful machines, which are even noisier than present machines. Another reason for their reluctance is that snowmobile sales in the Yellowstone area are only about 1% of their total sales. The other 99% expresses little if any demand for quieter machines. Hence, asking manufacturers to voluntarily design quieter machines will not accomplish anything; snowmobiles must be eliminated entirely to restore quiet.
 - b) Again, the benefits of mass transportation would be realized under this suggestion: snowcoaches are cleaner and quieter, more fuel-efficient/less resource consuming, and more easily regulated numerically.
 - c) Snowcoaches have become a part of the historic winter visitor experience in Yellowstone. Snowcoaches arrived on Yellowstone's winter scene at least eight years before snowmobiles, and are rarer than snowmobiles. Hence,

snowcoaches are arguably more historic than snowmobiles. This option allows for their continued use in the park.

- 5) Affordable lodging at Old Faithful needs to be made available to the public. The NPS is promoting the preferred alternative partly because it will make a winter visit to the park more affordable to most Americans, by reducing the cost of transportation. This is laudable, but it is hypocritical to reduce the cost of transportation while at the same time pricing most Americans out of overnight accommodations at Old Faithful. This means that Old Faithful in winter is still effectively the playground of the rich. It would seem that the Park Service's right hand does not know what its left hand is doing. Be consistent and make the winter visit truly affordable, perhaps by dropping the Western Cabin price by 50%.
- 6) The National Park Service needs to reexamine its view on snowmobile use in any national park. Since snowmobiles were developed in the 1960's and 70's, the NPS has viewed them not as the recreational vehicle that they are but rather as a mode of transportation as natural in winter as automobiles are in the summer. While this may sound logical, it is not the perception that most users of snowmobiles have, whether they are first-time or repeat users. Most first-time users view them as novelties. This impression then dominates their experience of the park—instead of the park's resources. Other first-time users and many repeat users view these machines as recreational vehicles or toys, in the same class as jet-skis, four-wheelers, and road bikes. No matter what the NPS thinks, the nature of snowmobiles dictates otherwise: the public sees them as recreational novelties. As such, the experience of snowmobiling comes to dominate the winter scene, rather than experiencing Yellowstone's fabulous resources.

Parts of Alternative B that I especially like include the following:

- 1) The continued research of winter and winter use on the park's wildlife. Wildlife concerns have been a nagging problem for decades; let's find out the truth!
- 2) In line with wildlife research, the adaptive management aspect of Alt. B. Having the flexibility to change the operation is important if we do discover that winter has unacceptable impacts on the park's wildlife.
- 3) The cutting of regular "escape routes" for the park's wildlife through the roadside berms, so that the animals may get off the roads.
- 4) The ban on late-night travel. Night-time conditions are especially dangerous, particularly with animals bedding down on roadways as they do.

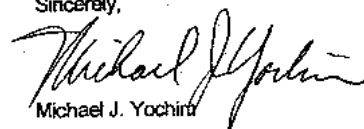
Finally, I must say a word about the "Citizen's Alternative" put forth by the various environmental groups of the area. As you know, the primary element of their plan is to restrict all inner park travel to snowcoaches only. After giving this idea serious,

extended thought as I wrote my thesis, I decided against it because of these two reasons:

- 1) Snowcoaches are a financial disaster for most companies who use them. My experience with AmFac as a snowcoach driver confirmed this time and again: snowcoach maintenance and upkeep sucked all the profit out of the winter venture. While there is one business that does turn a profit on its snowcoach operation (the Alpenguides), I don't think there are many business owners willing to enter into a touring operation dependent on snowcoaches, and knowing their disadvantages. By contrast, many businesses already own buses and vans for summer use in the Yellowstone area; using such vehicles year-round would only help these businesses justify their vehicle costs more, and make such businesses all the more profitable.
- 2) Even if snowcoaches were profitable, the price of touring on them is still extremely expensive, more than twice that of a bus ticket for a tour of a similar length (as based again on AmFac's summer and winter prices). The average American cannot afford such tickets, meaning that the winter visit would still be something only the wealthy could afford. Neither snowcoaches nor snowmobiles are ever going to make that visit affordable to everyone. *The only way to make a winter visit affordable to the average "Joe" is by plowing the road to Old Faithful.* To me, this is one of the critical issues, along with air quality, noise reduction, and quality of the touring experience.

Thanks for the opportunity to comment. I hope you seriously consider my suggestions, and implement them.

Sincerely,



Michael J. Yochim

MICHAEL J. YOCHIM

Page 1. Re: Incorporation of Yochim publications as literature to be cited. NPS will review the information and incorporate it as necessary.

Pages 1-5. Commenter presents variations on alternative B, and reasons for the variations. Since an alternative selection and the rationale for it are reserved for the decision to be made, most of this subject matter cannot be responded to. Also, since the preferred alternative will change in the FEIS, the context for the comments no longer exists. Alternative B and its various features remain as choices for the decision maker.

Re: Plow entire north and west side of park, for logistic ease, visitor access, and cost reduction. Plowing the road from Mammoth to Norris and then south to Madison was not considered to be a feasible alternative for several reasons. These sections of road receive a good deal more snow and wind during the winter season than other road sections proposed for plowing. Park maintenance staff are concerned that during the deep winter, the narrow curvy road template coupled with high cross winds would prohibit any degree of certainty in keeping the road open. Plowing these road sections during the late winter season as suggested in alternative C was considered to be the only feasible option for plowing from Mammoth to Madison. In agreement with the commenter, the analysis presented for both alternatives C and B (see pages 219-222 and 240 –242) suggest that adverse effects would occur under these alternatives because of the complex travel logistics required by both park visitors and employees.

Re: Restrict plowed roads to public vehicles only. Alternative B does limit use to concessions or NPS managed access on the plowed road from West Yellowstone to Old Faithful. A very limited number of private vehicles would be accepted on the basis of reservations taken.

Re: Closing Sylvan Pass. This feature is present in alternative D, and remains available for selection by the decision maker.

Re: Close remainder of YNP to snowmobiles. Alternative G limits motorized oversnow access in all three park units to snowcoach only. This feature is available for selection by the decision maker.

Re: Affordable housing at Old Faithful. Commenter has a point. However, there remains a distinction between access and lodging unfortunately. The lodging portion of the experience is in the purview of concessions, not winter use access and recreation.

Re: Snowmobile access. This comment goes to the purpose and need for action. Snowcoach only access is a choice available to the decision maker, in alternative G.

Pages 5-6. Re: Non-support for The Citizens' Solution. Insofar as it resembles DEIS alternative G, is a comment going to the decision to be made. NPS acknowledges the expense of snowcoaches, as an affordability issue similar to the cost of lodging in the park interior. As with all alternatives, and their features, there are down-sides as well as up-sides. The Park Service's chief concern is to decide on the means whereby the public can enjoy the parks during the winter while protecting park values and resources. The preferred alternative in the FEIS will reflect this thinking.